

**Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services**

STATEMENT OF BASIS

**Motiva Enterprises LLC
Motiva Enterprises LLC - Convent Marketing Terminal
Convent St. James Parish, Louisiana
Agency Interest Number: 24076
Activity Number: PER20090002
Proposed Permit Number: 2560-00036-V4**

I. APPLICANT

Company:

Motiva Enterprises LLC - Convent Marketing Terminal
PO Box 935
Kenner, Louisiana 70063-0935

Facility:

Motiva Enterprises LLC
Hwys 70 & 44 jct.
Convent, St. James Parish, Louisiana
Approximate UTM coordinates are 702.35 kilometers East and 3331.55 kilometers North, Zone 15.

II. FACILITY AND CURRENT PERMIT STATUS

Convent Marketing Terminal was owned and operated by Texaco U.S.A under Permit No. 1555T-R1 dated July 2, 1981. Star Enterprise acquired the facility on December 31, 1998, and was operating under a Part 70 Permit No. 2560-00036-V0 dated December 19, 1997. Currently, Motiva Enterprises LLC owns the facility and is operating under a consolidated and modified Part 70 Permit No. 2560-00036-V3 dated February 13, 2009.

Convent Marketing Terminal receives petroleum products (gasoline, distillate, and kerosene) via pipeline and routes them directly to the loading terminal where they are loaded into tank trucks. All products are loaded into tank trucks by submerged fill loading at the rack. This rack is currently equipped with a vapor recovery unit (VRU) utilizing carbon adsorption to recover hydrocarbon vapors from tank truck loading operations. Fuel additives, including ethanol, are received by tank trucks and/or pipeline and are stored in tanks prior to in-line blending with the products while loading.

The denatured alcohol is received by pipeline and loaded into tank truck and shipped off site. The new vapor combustion unit for ethanol loading is also used as a backup for the existing vapor recovery unit.

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Motiva Enterprises LLC - Convent Marketing Terminal is a designated Part 70 source. The facility did not submit the application in time. LDEQ Enforcements has been informed.

III. PROPOSED PROJECT/PERMIT INFORMATION

Application

This review was initiated by an application dated September 1, 2009, for a renewal of a current Permit No. 2560-00036-V3 as referenced above. Additional information as of September 28, 2009 was also received.

Project

The facility is not being modified at this time.

Proposed Permit

The facility is proposing to renew the current permit without any changes.

Permitted Air Emissions

Permitted emissions from the marketing terminal in tons per year are as follows:

IV.	Pollutant	<u>Before</u>	<u>After*</u>	<u>Change</u>
	PM ₁₀	0.06	0.06	-
	SO ₂	0.25	0.25	-
	NO _x	5.68	5.68	-
	CO	14.21	14.21	-
	VOC	63.58	63.58	-

* Contiguous with Motiva Enterprises, LLC, Convent Refinery

A notice requesting public comment on the permit renewal will be published in The Advocate, Baton Rouge, Louisiana and New Examiner, Louisiana. The public will be allowed to comment within a specified time on the proposed permit. Written and oral comments received during the comment period from the general public and organizations will be considered before issuing the permit. Copies of the public notice will be mailed out to individuals on the mailing list maintained by Office of Environmental Services.

IV REGULATORY ANALYSIS

The facility complies with all the applicable requirements of New Source Performance Standards (NSPS), Subpart XX – Standards of Performance for Bulk Gasoline Terminals and National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart R – National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations).

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The facility complies with all the State requirements approved under State Implementation Plan (SIP) approved by Environmental Protection Agency (EPA) and the state requirements such as Comprehensive Toxic Air Pollutant Emission Control Program and odor regulations. Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are provided in the Specific Requirements section of the proposed permit.

Applicability and Exemptions of Selected Subject Items

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Status	Citation	Explanation
UNF001 Facility Wide	Compliance Assurance Monitoring for Major Stationary Sources	Exempt	40 CFR 64.2(b)	The facility is subject to NESHAP, 40 CFR 63, Subpart R which was proposed after November 15, 1990
	Chemical Accident Prevention and Minimization of Consequences	Exempt	40 CFR 68 LAC 33:III.Chapter 59	Does not store listed toxics and inflammable substances above threshold
FUGS Fugitive Equipment Leaks	Fugitive Emissions Control	Does not apply	LAC 33:III.2121	Petroleum Marketing Terminal
EQT012 and 013 T-2 and T-5, SPCC and System 3 Tanks	NESHAP, Subpart R – Bulk Gasoline Terminal	Exempt	40 CFR 63.423(a)	Tank does not store gasoline
	NSPS, Subpart K, Ka, Kb – Petroleum Product and VOC storage Vessels	Does not apply	40 CFR 110 40 CFR 60.110a 40 CFR 60.110b(b)	Capacity less than 40,000 gal and was constructed in 1982
	Control of Emission of Organic Compounds – Storage of VOCs	Does not apply	LAC 33:III.2103	Does not store VOC
EQT015 VRU, Vapor Recovery System	Volatile Organic Compounds Loading	Exempt	LAC 33:III.2107.F	Gasoline Loading Requirements
EQT016 LR-F, Loading Rack Emissions	Fugitive Emissions Control	Does not apply	LAC 33:III.2121	Petroleum Marketing Terminal
EQT017 VCU, Vapor Combustor Unit	Emission Standards for Sulfur Dioxide	Does not apply	LAC 33:III.1502	Emits less than 5 tons per year of sulfur dioxide

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Prevention of Significant Deterioration/Nonattainment Review

PSD review is not required.

Streamlined Equipment Leak Monitoring Program

The facility is not proposing any streamlined monitoring

MACT Requirements

The facility monitors the carbon canisters for breakthrough, vapor recovery system and the vapor combustor as control devices for the loading racks and the ethanol tanks under the requirements of NESHA, Subpart R.

Air Quality Analysis

Emissions associated with the proposed modification were reviewed by the Air Quality Assessment Division to ensure compliance with the National Ambient Air Quality Standards (NAAQS) and Ambient Air Standards (AAS). LDEQ did not require the applicant to model emissions.

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

V. PERMIT SHIELD

None requested

VI. PERIODIC MONITORING

The facility shall monitor the breakthrough from the carbon canisters and monitor the equipment leaks as per the MACT requirements as referenced above. For details see the Specific Requirements section of the proposed permit.

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VII. GLOSSARY

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H₂S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C (“Prevention of Significant Deterioration of Air Quality”) and D (“Nonattainment New Source Review”).

Nitrogen Oxides (NO_x) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH₄), Ethane (C₂H₆), Carbon Disulfide (CS₂)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM₁₀ – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

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Sulfur Dioxide (SO₂) – An oxide of sulfur.

Sulfuric Acid (H₂SO₄) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – Sec Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.